

August 4, 2010

To Commissioner Philip Giudice,

Please accept my comments on the Manomet Study.

I am a property owner in Tolland, Massachusetts and support the development of biomass-based energy (both for power, for heat and for a combination) in the State of Massachusetts. We, as consumers of energy, must recognize when seeking alternatives to fossil fuel-based energy that no energy source is perfect—they all require trade offs.

I believe Massachusetts can sustainably support numerous biomass-based facilities. The western part of the state is heavily forested with enough wood to support an active, robust, and financially viable industry. At least one of the facilities needs to be in the 25-50 MW size to encourage the expansion and development of a logging and transportation infrastructure. A few school heating systems will not demand enough biomass (chips) to stimulate a market in a substantial way.

Most of Massachusetts' forests are owned by private landowners with individual objectives for their forestland. As numerous studies have found, landowners do not consider timber harvesting to be at the top of their list of objectives. Things like wildlife habitat improvement and aesthetics seem to be more important—both often require timber harvesting to achieve. Therefore, the development of a biomass industry in Massachusetts will not result in a “mowing” down of the forest as some proponents suggest.

Landowners view whole tree harvesting as a way to “clean out” or improve their forests. Biomass harvesting is and always will be a marginal activity. The real value and interest is in the sawlog and veneer products. It is interesting to note that when sawlog markets have been good the amount of wood reaching the market remains about the same--indicating a lack of wholesale reaction by landowners. Despite a decline in the number of sawmills in Massachusetts, the market for logs remains robust with wood moving to other states, Canada, and overseas. Landowners do have an option to harvest timber which in turn presents the option to harvest biomass. The Manomet Study looked at a high cost and low cost scenario for biomass stumpage pricing. I found the entire premise to be ridiculous with no basis in reality. I would be more interested in the elasticity of the biomass market to withstand a price increase. In the wood industry the market sets the price not the supplier.

I would encourage the DOER to go beyond the Forest Guild for recommendations. The Guild does not represent mainstream forestry in New England. I find the suggestion that Massachusetts should adopt the Forest Guild's Biomass Harvesting Guidelines to be a bit self-serving and verging on a conflict-of-interest as the primary author of those guidelines is also a primary author of the Manomet study. I recommend seeking the input of the professional foresters in Massachusetts and the knowledgeable of veteran forestry staff at the state level. To discount these groups and not engage them in the process, I feel, will lead to a result that is unworkable.

The suggestion that biomass be required to be produced under 3rd party certification could (and probably would) kill the opportunity by creating an expensive and onerous process which would discourage landowners from entering the market. Massachusetts has numerous professional foresters working within the state that could play a role. In addition, the state has timber harvesting laws that presently regulate harvesting.

I found the carbon discussion as well as the nutrient depletion discussions to be shaky at best. There is just not enough science to support development of policy which considers the diversity and resilience of the northeastern forests at this time. Perhaps in the future, there will be consensus on these subjects presently there is not.

Please be cautious in using the recommendations from the Manomet Study. The report is a quagmire of assumptions (some of which are ridiculous); full of conditional language; carbon confusion and nutrient nonsense. Please compare biomass fairly with other fossil fuels. What about mercury? What about mountain-top removal? And, what about the oil slick in the Gulf of Mexico?

Finally, I would encourage Massachusetts to look to New Hampshire which supports seven wood-to-energy plants consuming almost 2 million tons of biomass each year. The state is not denuded or its forests degraded. Rather, landowners and the state jointly contribute to the state's \$1.7 billion wood products industry. The forest products industry provides incentives for landowners to keep their forests as forests and not to convert them to other uses. I ask the DOER to take the responsibility to utilize a home-grown, renewable, and sustainable fuel—BIOMASS!

Thank you for your consideration,

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